

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

TRUTEK CORP.,

Plaintiff,

Case No. 4:21-cv-10312

v.

Hon. F. Kay Behm

BLUEWILLOW BIOLOGICS, INC., et.  
al.

Defendants.

---

**STIPULATION TO EXTEND TIME FOR THE PARTIES  
TO RESPOND TO MOTIONS FOR SUMMARY JUDGMENT  
AND MOTIONS TO EXCLUDE EXPERT TESTIMONY**

Plaintiff/Counter-Defendant Trutek Corp and Defendant/Counter-Plaintiff BlueWillow Biologics, Inc., through their undersigned counsel, respectfully move for an order extending the deadlines for both parties to respond to certain motions to exclude expert witness testimony and motions for summary judgment by an additional thirty (30) days.

The parties conferred, and each concur that an additional thirty (30) days beyond the current deadline shall be granted to any party wishing to file a Response Brief, with Reply Briefs due fourteen (14) days thereafter, for the motions listed below.

Plaintiff requests this extension due to extenuating circumstances. On or about April 15, 2023, Lead-Counsel for Plaintiff, Stanley Kremen, Esq., required immediate and necessary hospitalization related to a cardiac issue. Due to the seriousness and severity of

Mr. Kremen's health problems and the time needed to recover and provide adequate representation, the parties hereby stipulate that the Court grant an extension of thirty (30) days for responses to the following motions, with replies due fourteen (14) days thereafter, according to the schedule below:

<b>Pending Motion</b>	<b>Response Deadline</b>	<b>Reply Deadline</b>
Dkt. 59: Defendant's Motion for Summary Judgment	June 1, 2023	June 15, 2023
Dkt. 61: Plaintiff's Motion to Exclude Testimony of Mansoor M. Amiji, Ph.D	May 26, 2023	June 9, 2023
Dkt. 62: Plaintiff's Motion for Partial Summary Judgment	June 5, 2023	June 19, 2023

Respectfully Submitted,

**It is so stipulated.**

Dated: April 21, 2023

/s/ Stanley H. Kremen

Stanley H. Kremen, Esq.  
4 Lenape Lane  
East Brunswick, New Jersey 08816  
Telephone: (732) 593-7294  
shk@shk-dplc.com  
shklaw@kremen.us  
*Attorney for Plaintiff*

/s/ Keith Altman

Keith Altman, Esq.  
The Law Office of Keith Altman  
33228 West 12 Mile Road, Suite 375  
Farmington Hills, Michigan 48334  
Telephone: (248) 987-8929  
keithaltman@kaltmanlaw.com  
*Attorney for Plaintiff*

**It is so stipulated.**

Dated: April 21, 2023

By: /s/ Liane M. Peterson (w/ permission)

Liane M. Peterson  
FOLEY & LARDNER LLP  
3000 K Street NW  
Washington D.C. 48226  
Telephone: (202) 672-5300

Nicholas J. Ellis  
FOLEY & LARDNER LLP  
500 Woodward Avenue  
Suite 2700  
Detroit, MI 48226  
Telephone (313) 234-7100

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

TRUTEK CORP.,

Plaintiff,

Case No. 4:21-cv-10312

v.

Hon. F. Kay Behm

BLUEWILLOW BIOLOGICS, INC., et.  
al.

Defendants.

---

**CERTIFICATE OF SERVICE**

I certify that on April 21, 2023, I served the foregoing Stipulation to Extend Time upon all parties herein by submitting copies of same using the ECF System and via electronic mail.



Keith Altman, Esq.